

EXHIBIT A

1 David S. Casey, Jr., SBN 060768

2 *dcasey@cglaw.com*

3 Jeremy Robinson, SBN 188325

4 *jrobinson@cglaw.com*

5 Angela Jae Chun, SBN 248571

6 *ajc@cglaw.com*

7 P. Camille Guerra, SBN 326546

8 *camille@cglaw.com*

9 James M. Davis, SBN 301636

10 *jdavis@cglaw.com*

11 **CASEY GERRY SCHENK
FRANCAVILLA BLATT &
PENFIELD, LLP**

12 110 Laurel Street

13 San Diego, CA 92101

14 Telephone: (619) 238-1811

15 Facsimile: (619) 544-9232

16 *Attorneys for Certain Victims From the
Camp Fire and 2017 North Bay Fires*

17 Francis O. Scarpulla (SBN 41059)

18 **LAW OFFICES OF FRANCIS O. SCARPULLA**

19 456 Montgomery Street, 17th Floor

20 San Francisco, CA 94104

21 Telephone: (415) 788-7210

22 Email: *fos@scarpullalaw.com*

23 Jeremiah F. Hallisey (SBN 40001)

24 **HALLISEY & JOHNSON, PC**

25 465 California Street, Suite 405

26 San Francisco, CA 94104

27 Telephone: (415) 433-5300

28 Email: *jfhallisey@gmail.com*

Attorneys for Creditors

GER HOSPITALITY, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

Bankruptcy Case No.: 19-30088 (DM)

Hon. Dennis Montali

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION RE MOTION TO
EXPUNGE CLASS PROOF OF
CLAIM FILED BY GER
HOSPITALITY, LLC**

1 This stipulation is made between Certain Victims from the Camp Fire and 2017
2 North Bay Fires ("Certain Fire Victims") and GER Hospitality, LLC ("GER"), by and
3 through their respective counsel. The parties stipulate as follows:
4

- 5 1. On March 23, 2020, certain victims from the Camp Fire and 2017 North Bay
6 Fires ("Certain Fire Victims") filed a Motion to Expunge Class Proof of Claim
7 filed by GER Hospitality, LLC (Doc#6438). An amended motion was filed on
8 April 7, 2020. (Doc#6675). The hearing on this motion is set for April 29,
9 2020, at 10:00.a.m.
10
- 11 2. On April 9, 2020, GER Hospitality, LLC ("GER") filed an Opposition to the
12 Motion to Expunge Class Proof of Claim. (Doc#6716)
13
- 14 3. On April 22, 2020, Certain Fire Victims filed a reply to GER's opposition.
15 (Doc#6887).
16
- 17 4. Certain Fire Victims agree to withdraw their pending Motion to Expunge.
18
- 19 5. In exchange, GER agrees to limit its proposed class by excluding any and all
20 potential class members/fire victims that have retained an attorney and are
21 represented by legal counsel for their claims against PG&E arising out of the
22 2018 Camp fire.
23
- 24 6. By withdrawing their motion to expunge, Certain Fire Victims are not agreeing
25 that class treatment is appropriate for GER's proposed class claims or that the
26 proposed class claims are proper.
27
- 28 7. The trustee of the PG&E fire victims trust will determine the validity and value

1 of GER's class claims at a later date.

2 8. Paragraphs 5-7 of this stipulation also applies the following other class claims,
3 including any amendments thereto, asserted by counsel for GER:
4

5 a. Anita Freeman, on behalf of herself and of all residents of Butte County
6 as of November 8, 2018 who suffered loss and damage arising from the
7 Camp fire, claim number 5938, filed 8/1/19 (Camp fire,
8 property/economic damage);
9

10 b. Karen Roberds on behalf of herself and of all residents of Butte County
11 as of November 8, 2018 who suffered loss and damage arising from the
12 Camp fire, claim number 5632, filed 7/23/2019, (North Bay fires,
13 property/economic damage);
14

15 c. William N. Steel on behalf of himself and all persons who resided in the
16 Veterans Home of California, claim number 5666, filed 7/24/2019 (North
17 bay fires).
18

19
20 Dated: April 29, 2020

**CASEY GERRY SCHENK
FRANCAVILLA BLATT
& PENFIELD, LLP**

21
22 By: Angela Jae Chun
23 Angela Jae Chun

24 Attorneys for Certain Victims
25 From the Camp Fire and
26 2017 North Bay Fires
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Dated: 4/29/20

**LAW OFFICES OF FRANCIS O.
SCARPULLA**

By: Francis O. Scarpulla
Francis O. Scarpulla
Attorneys for GER Hospitality, LLC

Dated:

HALLISLEY & JOHNSON, PC

By: _____
Jeremiah F. Hallisley
Attorneys for GER Hospitality, LLC

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Dated:

**LAW OFFICES OF FRANCIS O.
SCARPULLA**

By: _____

Francis O. Scarpulla
Attorneys for GER Hospitality, LLC

Dated:

HALLISLEY & JOHNSON, PC

By: _____

Jeremiah F. Hallisley
Jeremiah F. Hallisley
Attorneys for GER Hospitality, LLC